



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 29, 2018

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *R.F.M. v. Nielsen*, 18 Civ. 5068 (JGK)

Dear Judge Koeltl:

This Office represents Defendants (the “Government”) in the above-referenced action brought under the Administrative Procedure Act. Pursuant to the Court’s order dated August 13, 2018 [Dkt. No. 61], the Government will be filing a supplemental administrative record in this case consisting of the A-file of the additional plaintiff, O.M.S., named in the amended complaint. Because the A-file contains O.M.S.’s full name and other personally identifiable information which is the subject of the plaintiffs’ motion to proceed anonymously [Dkt. No. 6], we respectfully request that the Court enter an order permitting the Government to file the O.M.S.’s A-file under seal. Additionally, because the A-file is voluminous, we respectfully request leave to file the A-file in the form of a CD that will be placed under seal with the Court. Should the Court deny or modify plaintiffs’ request to proceed anonymously, the Government will move to unseal the A-file in accordance with the Court’s order.

We thank the Court for its consideration of this letter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Kirti Vaidya Reddy
KIRTI VAIDYA REDDY
TOMOKO ONOZAWA
Assistant United States Attorneys
Tel: (212) 637-2751/2721
Fax: (212) 637-2686
Email: kirti.reddy@usdoj.gov
tomoko.onozawa@usdoj.gov

cc: All Plaintiffs of Record (via ECF)